

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Federal-State Joint Board on	)	
Universal Service:	)	CC Docket No. 96-45
	)	
Requests to Redefine “Voice Grade	)	DA 99-2985
Access” for Purposes of Federal	)	
Universal Service Support	)	

**REPLY COMMENTS OF  
THE CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION**

The Cellular Telecommunications Industry Association<sup>1</sup> (“CTIA”) hereby files reply comments on the proposal identified in the December 22, 1999, *Public Notice*<sup>2</sup> that would modify the definition of “voice grade access” for purposes of designating carriers as eligible telecommunications carriers (“ETCs”) for receipt of federal universal service support. CTIA shares the concerns articulated by Western Wireless Corporation that the proposal does little to advance the public interest because it would undermine both wireless and wireline carriers’ efforts to obtain ETC status in order to serve rural and insular areas. BellSouth explains that such modifications would likely render most incumbent LECs ineligible to receive universal service support.<sup>3</sup> This fact, combined

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<sup>1</sup> CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers all Commercial Mobile Radio Service (“CMRS”) providers, including 48 of the 50 largest cellular and broadband personal communications service (“PCS”) providers. CTIA represents more broadband PCS carriers and more cellular carriers than any other trade association.

<sup>2</sup> *Public Notice*, Common Carrier Bureau Seeks Comment on Requests to Redefine “Voice Grade Access” for Purposes of Federal Universal Service Support, CC Docket No. 96045, DA 99-2985 (rel. Dec. 22, 1999).

with the fact that the FCC would be establishing more, instead of fewer, obstacles to wireless and new entrant's ability to obtain ETC designation, adds an additional, and unnecessary hurdle to bringing competition, and in some cases, initial service roll-out, to unserved and underserved areas.<sup>4</sup>

The Commission had it right the first time when it adopted the current voice grade access standard of Section 54.101 of the rules. At that time, the Commission affirmatively stated that it did not intend to impose a more onerous definition of voice grade access than those generally established under industry standards.<sup>5</sup> The FCC should act consistently with that policy and continue to strike a careful balance between ensuring that rural consumers can access the Internet and other information services at reasonably comparable data transmission speeds with non-rural consumers and the primary need of rural consumers to receive basic telephone service at affordable and competitive rates. Wireless and new entrant competition can bring basic services and reasonably comparable data services to rural America.

Moreover, the proponents of modifying the voice grade access rule do not suggest that the current 300 Hz to 3,000 Hz frequency range is insufficient to ensure appropriate quality of voice transmission.<sup>6</sup> In the absence of such a showing, the Commission should

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<sup>3</sup> Comments of BellSouth Corporation, CC Docket No. 96-45, dated January 19, 2000, at 2.

<sup>4</sup> Bell Atlantic notes in its comments that enlarging the bandwidth that a LEC must provide on voice grade access lines could prevent many small, rural carriers from qualifying as ETCs. Bell Atlantic also stated that increasing the bandwidth is irrelevant to the issue of whether a carrier is providing voice grade service. Comments of Bell Atlantic, CC Docket No. 96-45, dated January 19, 2000.

<sup>5</sup> Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Fourth Order on Reconsideration, 13 FCC Rcd. 5318, 5329, para. 16 (1997).

not change its rules and make it more difficult for all carriers to qualify as ETCs.

Consumers would not be served by such a policy change.

Respectfully submitted,

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February 4, 2000

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<sup>6</sup> *Public Notice*, at 2.